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1 GHCC/NPT	Steelhead Habitat	All we know about these particular allotments from the scoping notice is that threatened Snake River steelhead and its critical habitat are known to exist within the Cold Spring and Teepee Elk Allotments. The scoping notice does not provide information about the ecological conditions of the streams or riparian areas.	Steelhead and habitat (streams, riparian areas) are discussed in the Aquatics BA and BE, catchfly habitat is discussed in the Botany BA, and the range (grasslands) condition is discussed in the Range report. The Forest Service discussed with the public known conditions at the pre-scoping open house (July 2018).
2 GHCC	Catchfly Habitat	The allotments contain catchfly habitat but surveys conducted did not find the presence of catchfly. These have been identified as issues that the forthcoming EA will address.	Catchfly was not considered an issue because it is not known to be present in the project area.
3 GHCC	Range of Alternatives	We ask that the purpose and need will be revised and robust alternative developed in the forthcoming EA that address the issues. We request that the USFS look at all reasonable alternatives and consider, in detail, an action alternative that would reduce grazing levels, and implement a rest-rotation schedule.	The Purpose and Need was developed to address the question of whether to continue grazing in the project area allotments. The Purpose and Need helps focus a range of reasonable alternatives. NEPA does not require a specific number of alternatives (36 CFR 220.7(b)(2)). Alternative 1 would not authorize grazing (which addresses reduced grazing). Alternative 2 and 3 propose resting pastures as one of several measures to

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			mitigate resource impacts.
4 GHCC/OW	Range	Conduct a suitability analysis.	Acres available for grazing was calculated from the Capable Suitable model of suitable acres made by GIS for the Forest Plan.
5 GHCC	Range	Disclose other activities allowed by or conducted by the USFS on behalf of permittees within these permit areas (allotments) including but not limited to logging, road maintenance, tree removal, and so forth.	The Forest Service assumes the permittee will do the maintenance, reconstruction and management work as described within the term grazing permit and that the permittee will use the necessary tools, machinery and transportation to accomplish this work.
6 GHCC	Botany	Disclose the location and state of all aspen stands and ensure protection where the species occurs. Aspen are present in the project area and are being impacted by livestock grazing.	The known aspen stands are within enclosure fences.

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7 GHCC / OW	Economics	Conduct a thorough internal economic analysis that includes cost to taxpayer for fencing, monitoring, enforcement, road maintenance, loss of ecosystem services such as water quality as well as grazing fees that have been received.	The Forest Service is authorized to permit grazing on suitable National Forest System lands, including in this project area (Multiple Use Sustained -Yield Act, 1960, FSM 2202.1, and Wallowa-Whitman National Forest Plan (1990), Hells Canyon National Recreation Area ACT, (1975)). In addition, Congress annually appropriates funds for the USDA Forest Service to apply to the management of range management activities on National Forest System lands. As such, an internal economic analysis was not considered necessary to determine whether to authorize grazing in the project area.
8 GHCC	Range	Assess and disclose the state enclosures, fencing, water diversions (and other water enhancements), and other infrastructures as well as the required maintenance and maintenance cost. Explain how fences and other mitigation will be maintained over time.	Maintenance and reconstruction of range infrastructure is a term of permit compliance and is the responsibility of the permittee. Fees collected from permitted grazing are applied toward range improvements, such as fences.

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9 GHCC	Hydrology	Disclose what, if any, streams in the analysis area are on the State of Oregon's 303(d) list and whether any corresponding TMDLs have been established, and address any proposed compliance measures.	Addressed in Hydrology report at 4.
10 GHCC	TES/ Range of Alternatives	Analyze a reasonable range of alternatives to the proposed action, and take a hard look at the impacts of the proposed actions on threatened, endangered and sensitive species and other resources of concern.	Potential impacts are addressed in the Aquatics BE and BA, Botany BA, and Wildlife BE. Refer to response to comment 3 regarding range of alternatives.
11 GHCC	NEPA	Meet the requirements of the Forest Plan and HCNRA CMP.	Addressed in the Consistency with Forest Plan and CMP section of the draft EA, at 20-21.

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12 GHCC	NEPA	The USFS should consider preparing an EIS.	An EIS is required if effects from proposed action are felt to be significant or are unknown. Potential effects of cattle grazing are known and the Forest Service has proposed measure to mitigate impacts.
13 GHCC	Invasive Species	The forthcoming environmental analysis should address how the further spread of invasive weeds will be avoided or mitigated under each proposed alternative.	Addressed in invasive weeds analysis, draft EA at 10 -11.
14 GHCC	Soils	The environmental analysis should engage in a thorough analysis of soils and native vegetation and the effects of the proposed grazing on the soils and vegetation within the planning area.	Soils are discussed as part of the range condition in the range report. Reference to Forest Plan and CMP direction on page 1 of the Range Report.

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15 GHCC	TES	Monitoring data for the presence of threatened, endangered and sensitive (TES) species must be gathered prior to an environmental analysis and incorporated into that process.	Refer to comment 1. There are no TES plants in the proposed project area, only TES fish. See Aquatics section in the draft EA and the Aquatics BA.
16 GHCC/OW	Climate Changes	Livestock grazing on public lands alters vegetation, soils, hydrology, and wildlife species composition and abundance in ways that exacerbate the effects of climate change on these resources. Grazing negatively impacts riparian vegetation, water turbidity, and stream temperature, this in turn affects fisheries as they respond to a changing climate. The ecosystem will store more carbon and help mitigate climate change if they remain ungrazed. The agency needs to help mitigate climate change by managing all living systems to capture and storage optimal levels of carbon. Livestock grazing reduces carbon storage in vegetation and soil at an ecosystem scale and grazing must be reduced to help mitigate climate change.	Local greenhouse gas (GHG) emissions mix readily into the global pool of GHGs, and the indirect effects of emissions from single projects of this size on global climate cannot be meaningfully measured. Therefore, at the global and national scales, this proposed action's direct and indirect contribution to GHGs and climate change would be negligible. In addition, because the direct and indirect effects would be negligible, the proposed action's contribution to cumulative effects on global GHGs and climate change would also be negligible (Office of Sustainability and Climate).
17 GHCC	Range	Livestock grazing also has detrimental impacts on native plant communities.	Assessed and documented in Range Report at 20, 27-28, 35-36 and, the draft EA at 10 -11.

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18 OW	Wilderness	Assess impacts to proposed wilderness and sensitive landscapes.	There are no administratively recommended wilderness areas within the project area, nor any known designations of sensitive landscapes.
19 OW	Wildlife	Concerns of displacement and overgrazing affecting late-season forage.	Addressed in the Wildlife section of the draft EA at 18, and the Wildlife BE at 3-4.
20 OW	Public safety and Recreation	Please address recreation conflicts and human safety concerns in this analysis.	The Forest Service is aware of one calf being reported as hit by a vehicle on a road within the project area, but otherwise there are no other reports of safety concerns. The proposed action includes a fence around Dougherty Campground to exclude cattle. This was the only recreation/cattle concern identified within the project area.
21 OW	Wolves	We urge the USFS to give more thought (not only to grazing suitability) but also mitigation measures including alternative grazing patterns that might reduce conflict. • Livestock should not be released within one mile of known den and rendezvous sites. Presence should be assumed at recently used (within the last 5-years) sites	The Forest Service will follow the Oregon Wolf Conservation and Management Plan (June 2019) guidance for minimizing cattle/wolf impacts, and the process and coordination for implementing these tools between permittees and authorizing

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		unless proactive monitoring by agency staff at the appropriate time indicates absence. • Prohibit the turnout of sick and injured livestock to reduce the risk of attracting or being preyed upon by wolves and other native carnivores. Require the removal of sick, injured, or otherwise vulnerable livestock. • Require prompt remove and dispose of livestock carcasses • Prohibit salt and other livestock attractants within one mile of known wolf dens, rendezvous sites, and regular travel routes. • Prohibit wolf attractants in pastures occupied by wolves • Ensure USFS personnel regularly consult with wildlife agencies to help reduce conflict with wolves. That includes requiring compliance with state requirements for non-lethal conflict deterrence. • Prohibit turnout of pregnant cows and calves under 200 pounds. • Prohibit USFS staff from sharing specific wolf location information with permittees. • Manage livestock to avoid conflicts with predators. Special attention should be given to facilitate recovery of ecologically functional populations of threatened gray wolves. Some allotments may need to be closed to give predator populations and opportunity to expand thrive while minimizing risks of human conflicts. Where grazing will continue in areas frequented by predators, permitees should be required to take all necessary steps to avoid conflicts and use non-lethal methods to	agencies, such as Oregon Department of Fish and Wildlife (draft EA at 17). Calving generally does not occur on National Forest System allotments.

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		prevent and limit depredation of livestock.	
22 OW	Range	Grazing should be eliminated or grazing seasons should be very short in order to prevent irreversible damage to drought-stressed plants and it will significantly impact the ability of plants to set seeds.	Alternative 1 addresses the elimination of grazing.
23 OW	Pollinators	Consider and minimize adverse impacts of livestock grazing on pollinators.	Potential impacts to pollinators' habitat would be mitigated in the project area through implementing deferred grazing and rest rotations.
24 OW	Range	Protect sensitive areas such as meadows wetlands and riparian areas.	The project design mitigates potential impacts these types of areas through deferred grazing, rest rotation, and fencing of riparian areas.
25 OW	Range	We strongly encourage the agency to make contingency plans that require the removal of livestock during droughts.	During annual permit administration, the Forest Service works with permittees to discuss adjustments to grazing strategy if drought conditions were to occur.
26 OW	Range	Livestock grazing conflicts with the maintenance and recovery of biotic soil crusts.	Biological soil conditions including soil is discussed in the Range Report at 19, 27 and 36.

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27 OW	Invasive Species	The agency should limit or exclude livestock in order to help prevent the spread of weeds.	Analyzed under the Alternative 1.
28 OW	Range of Alternatives	Please take steps to permanently terminate grazing authorizations in existing vacant or inactive allotments.	Analyzed under the Alternative 1, no grazing, and under Alternative 2, the proposed action.
29 OW	Range	The NEPA analysis for the applicable RMP is no longer current and adequate to support this proposed grazing decision. The agency cannot tier to that document because things have changed significantly, such as climate change and forest health concerns which are now paramount and were not addressed in that plan.	The term RMP refers to a Resource Management Plan which apply to BLM lands. There are no BLM lands in the project area.
30 OW	Range	Please mitigate all the significant ecological impacts of livestock grazing.	There were no significant effects identified. The relevant impacts are addressed in the draft EA at 9-21.

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31 WCBC	Water Development / Thinning	A more aggressive approach should be included in the analysis that advocates for more headwater ponds, other water developments, strong emphasis on weed control followed by reseeding, a possible increase in grass by opening up the forest where sunlight reaches the ground, and other activities to support continued and increased permittee opportunities.	No water specific development sites where proposed in this project area. Additional water developments will be reviewed and evaluated at a future time. This proposal to develop this spring is outside the scope of this project. Thinning activities were proposed under the 2015 Lower Joseph Creek Restoration Area, which overlaps with some of the CERA project.
32 WCBC/ WCSA	Range	Shortening the grazing periods one month ending on October 31st instead of November 30th as done in the past is short sighted and needs further discussion. Keeping the flexibility in the future if the permittee changes or other unforeseen occurrences would offer better management options. We would like to stay until November 30th, 5 months, allowing for flexibility in the future if the permittee changes or there are other unforeseen occurrences.	This action was address under Alternative 3, draft EA at 8.
33 WCBC/ WCSA	Aquatics	What are the reasons for installing a fence along Peavine Creek that is both expensive to build and maintain.	The Forest Service considered options for protecting ESA-listed threatened steelhead on Peavine Creek, while still offering opportunities for grazing on the surrounding Elk pasture, and determined a fence was the most effective protection. The Forest Service recognizes that there would be cost to the permittee to maintain the fence.

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34 WCSA	Range/ Range of Alternatives	Include the Lost Cow allotment and do not close it so that is could be used in the future if needed.	Analysis included in Alternative 3.
35 NPT	Range	The tribe supports closing the Lost Cow Allotment.	Analysis included in Alternative 1 and Alternative 2.
36 NPT	Range	The Forest should fully disclose the data and scientific literature used to develop the proposed AUMs in Table 1 of the scoping letter.	The current stocking rate is discussed in the Range Report at 15.
37 NPT	Range	Alternative grazing systems, such as rest rotation or deferred grazing, should be considered to better protect native plants and wildlife from the impacts of repeated season-long grazing.	Rest and Deferment are part of Alternatives 2 and 3, and are discussed in the draft EA at 7-8 and, Range Report at 40-42.
38 NPT	Climate Change	A more conservative approach to forage utilization is likely warranted in the face of increasing noxious weed encroachment and impacts form climate change. A thorough analysis of threats and changing conditions should help guide alternative development during the environmental analysis.	The project design criteria used in developing the action alternatives uses a strategy for deferring and resting pastures, which increases the flexibility of allowing rangeland resources to rest from grazing pressures during certain periods, which increases their resilience to disturbance.

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39 NPT	Range	The Forest should report past and current ecological conditionals for each pasture within the project area and clearly identify and describe areas of concern.	Refer to Issues section of the draft EA page 5-6.
40 NPT	Range	The proposal calls for the placement and maintenance of a riparian enclosure fence along Peavine Creek to minimize the impacts from livestock grazing. The Tribe asks that the Forest critically evaluate the management strategies that make such a fence necessary.	This concern was discussed with NPT on field trips *10/30/2018 and 08/07/2019,* and rationale was discussed. Peavine Creek fence is discussed in the Aquatics BE at page 27-29. Also, refer to response 35.
41 NPT	Wildlife	The tribe encourages the Forest to develop actions for minimizing grazing impacts to wildlife habitat, as well as identifying opportunities to improve rangeland conditions that area currently rated less than satisfactory.	Alternative 1 would eliminate grazing impacts on wildlife (draft EA at 16). The issues (draft EA at 5) address pastures rated as unsatisfactory.
42 NPT	MIS/ ESA	We encourage the Forest to fully inventory the areas and evaluate potential effects of proposed grazing on rare and unique resources. We recommend that environmental analysis consider impacts to these and other relevant species that may be impacted by commercial livestock grazing operations (including range improvements such as trough and fences). On addition to those species listed by the Oregon Conservation Strategy (ODFW 2016) there are also 13 rare plant species on Precious Lands. These species were not highlighted by the state conservation plan but are tacked by the Oregon Biodiversity Information Center. Species known to occur on the wildlife area, that may also occur in the Cold Spring and Teepee Elk allotment, are listed in Table 2.	The Forest Service considered potential effects of the proposed action on aquatic, botanical and wildlife species that are either listed under the ESA, included under the R6 Regional Forester Sensitive Species lists, or listed as Management Indicator Species (MIS) in the Wallowa-Whitman National Forest Plan (draft EA at 11-18).

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43 NPT	Range/ RX Fire	The cumulative effects analysis should consider actions proposed in the project area within the context of the wide range and magnitude of current and future activities, including but not limited to, the Lower Joseph Creek Restoration Project. Livestock grazing overlaid with proposed and on-going management actions over the next ten years may have significant cumulative effects. For this reason, the Tribe would like to see a comprehensive approach to coordinating prescribed fire activities with livestock grazing in the analysis area.	Prescribed burning activities in the Lower Joseph Creek Restoration project area were not found to be potentially significant under that analysis (2015). The CERA project are is located in a fire-adapted environment and the rangelands have developed over centuries under frequent wildfires. Fire can be beneficial to rangeland plant production and health. Prescribed burning would be designed to complement historic burn conditions.
44 NPT	Range/ RX Fire	Livestock grazing may need to be deferred in the year(s) following burning activities to allow understory plants to recover from the burn, meet forage utilization standards, and to minimize soil disturbance from hoof action on recently burned soils.	As discussed above, the rangeland resources in the CERA project area developed with frequent wildfires. Prescribed burning would be designed to occur under conditions for low to moderate burn severity. Pastures burned under these conditions can commonly recover in one growing season, and are also more resilient to potential impacts from severe wildfires. The Forest Service will work with permittees on an annual basis to adjust grazing strategies as needed to protect resources after prescribed burning.